

BELDOCK LEVINE & HOFFMAN LLP
99 PARK AVENUE, PH/26TH FLOOR
NEW YORK, N.Y. 10016

JONATHAN MOORE
DAVID B. RANKIN
LUNA DROUBI
MARC A. CANNAN
CYNTHIA ROLLINGS
JONATHAN K. POLLACK
HENRY A. DLUGACZ
STEPHEN J. BLUMERT
MYRON BELDOCK (1929-2016)
LAWRENCE S. LEVINE (1934-2004)
ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400
FAX: (212) 277-5880
WEBSITE: blhny.com

COUNSEL
BRUCE E. TRAUNER
PETER S. MATORIN
KAREN L. DIPPOLD
MARJORY D. FIELDS
EMILY JANE GOODMAN
(JUSTICE, NYS SUPREME COURT, RET.)
FRANK HANDELMAN

REF: 8289.093

WRITER'S DIRECT CONTACT:
646-496-2353
ben.meyers.esq@proton.me

February 1, 2024

VIA ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State, No. 23 Civ. 1471 (JMF)*

Your Honor:

I am Of Counsel to Beldock Levine & Hoffman LLP, representing Plaintiffs in the above-referenced action brought pursuant to the Freedom of Information Act ("FOIA"). On behalf of Plaintiffs, I write to respectfully request a 14-day extension of the February 5, 2024 deadline for Plaintiffs' response to Defendant's motion for summary judgment. Under the revised briefing schedule, Plaintiffs' opposition brief would be due February 19, 2024 and Defendant's reply, if any, would be due on March 21, 2024. Defendant consents to this request.

This is the third request by Plaintiffs for an extension of the briefing schedule. I was very recently brought into the case after the departures of the two associates previously handling this matter at the end of December, and respectfully request a short extension to adequately digest the file, consult with the Plaintiffs and prepare an appropriate response to Defendant's motion papers.

We thank the Court for its attention to this matter.

BELDOCK LEVINE & HOFFMAN LLP

Hon. Jesse M. Furman
February 1, 2024
Page 2

Respectfully submitted,


Benjamin Meyers

cc: Defendant's counsel (by ECF)